REMARKS/ARGUMENTS

Claim 12 was rejected under 35 U.S.C. § 112, second paragraph as being indefinite. Claims 1 to 3, 5 to 10 and 12 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Nguyen et al. (US 6,983,232) in further view of Herman (US 2001/0034592). Claim 11 was rejected under 35 U.S.C. §103(a) as being unpatentable over Nguyen et al. in view of Herman and in further view of Nakano et al. (US 2003/0018542).

Claims 1 and 12 have been amended.

Reconsideration of the application based on the following remarks is respectfully requested.

35 U.S.C. 112, second paragraph Rejections

Claim 12 was rejected under 35 U.S.C. § 112, second paragraph as being indefinite. Claim 12 has been amended to provide proper antecedent basis.

Withdrawal of the rejection under 35 U.S.C. §112, second paragraph of claim 12 is respectfully requested.

35 U.S.C. 103 Rejections

Claims 1 to 3, 5 to 10 and 12 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Nguyen et al. in further view of Herman.

Nguyen et al. describes a customer benefit tool which allows customer models to be validated under acceptance test conditions to ensure that the machine based processes and cycle times have been accurately modeled. (See col. 2; lines 51 to 54). A user proposes a configuration for an assembly line by selecting objects that represent assembly line equipment, the objects having specific values for operating characteristics. "The configuration and associated operating characteristic values are then used to build a discrete event simulation." (See col. 3; lines 9 to 10). To streamline the building of a simulation by selecting and arranging the simulation objects, templates may be created and values may be read into the template to create the simulation object." (Nguyen col. 3; lines 14 to 18). These simulation objects can also be formed using designer objects and templates. (See col. 5; line 56 to col. 6; line 1).

Herman discloses a flexographic simulator and diagnostic system use for training personnel. It "gives the user "hands-on" experience in recognizing, analyzing measuring and correcting production problems within the printing process." (Page 1, Paragraph [0006]).

Claim 1 recites a method for simulating process flows in the graphics industry and for displaying the result calculated in the simulated process flows and/or intermediate results, comprising the steps of:

inputting or selecting at least one order data set representing a print job via a user interface of a computer;

selecting process data sets representing machines via a graphical user interface, the process data sets representing the machines being stored in a library;

distributing the at least one order data set among the selected process data sets;

calculating links between the order data set and the process data sets as a function of the order data set and the process data sets;

creating a process flow from the calculated links;

calculating results or intermediate results for the process flow using the order data set; and

outputting the results or intermediate results on a display of the computer.

Nguyen et al. fails to teach or show "distributing the at least one order data set among the selected process data sets; calculating links between the order data set and the process data sets as a function of the order data set and the process data sets; creating a process flow from the calculated links" as recited in claim 1. Nguyen et al. teaches a method and tools for modeling an electronic components assembly system. (See col. 2; lines 14 to 22). Such an assembly line does not require the distribution of jobs among the machines because every job passes every station in such an electronic assembly line one after another. Therefore in Nguyen et al., an assembly line is modeled as one complete system and no distribution between several systems is disclosed as even envisioned. The importance of a distribution of the order data set is discussed in, for example, [0032] and [0033] of the specification of the present application. With regard to the acceptance test mentioned in Nguyen et al., this test only insures that machine based processes and cycle times have been accurately modeled. (See Nguyen et al. col. 2; lines 42 to 50). It cannot provide the claimed "at least one data set representing a **print job** of a user" as claimed. Herman relates only to a simulation for training the staff on **one printing press** and thus does not

address the problem of distributing print jobs among a plurality of machines in a print shop.

Moreover, it is respectfully submitted that it would not have been obvious to have combined Herman and Nguyen et al. There is no motivation to substitute any Herman teachings for Nguyen et al. Herman and Nguyen et al. are in different industries and have different purposes; Herman is limited to a training of a simulation of **one** flexographic machine focusing on showing the correct operating for flexographic printing personnel and Nguyen et al. is for a sales/ consulting demonstration (Herman Page 1, Paragraph [0005], Line 7 and Nguyen et al. Col. 1, Lines 62 to 63). Herman does not teach or show the simulation of how several printing presses work together.

Claim 12 recites a device for simulating process flows in the graphics industry and for displaying the result calculated in the simulated process flows or intermediate results on a display device, comprising:

at least one user interface for inputting or selecting at least one order data set representing a print job;

at least one graphical user interface for selecting process data sets representing machines;

at least one computer for distributing the at least one order data set among the selected process data sets and for calculating links between order data set and process data sets as a function of the order data set and the process data sets;

the computer for creating a process flow from the calculated links;

the computer for calculating the result or intermediate results for the process flow using the order data set; and

a display for displaying the results or intermediate results.

For at least the reasons set forth above with regard to claim 1, Nguyen et al. fails to teach or show "at least one computer for <u>distributing the at least one order data set among the selected process data sets</u> and for calculating links between order data set and process data sets as a function of the order data set and the process data sets; the computer for creating a process flow from the calculated links" as recited in claim 12. Neither Nguyen et al. nor Herman, in their simulations, address the typical and specific problem of the distribution of print jobs among printing machines.

Withdrawal of the rejection of claim 1 and to all claims depending therefrom and claim12 under 35 U.S.C. §103(a) is respectfully requested.

Claim 11 was rejected under 35 U.S.C. §103(a) as being unpatentable over Nguyen et al. on view of Herman and in further view of Nakano et al. (US 2003/0018542).

Nguyen et al. is discussed above.

Herman is discussed above.

Nakano et al. is cited solely for its alleged disclosure of the additional limitation: "wherein the process data sets contain dimensions associated with graphics industry devices or the dimensions associated with the devices are displayed on a display device." As such, it cannot cure the deficiencies in Nguyen et al. and Herman outlined above.

Withdrawal of the rejection of claim 11 is respectfully requested.

CONCLUSION

The present application is respectfully submitted as being in condition for allowance and applicants respectfully request such action.

Respectfully submitted,
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